TONGLI SHIPPING CO. LTD. and TONGLI LIMITED,  Defendants.	:	
- against –	:	NOTICE OF MOTION
Plaintiff,	:	07 Civ 3033 (BSJ)
RED SEA PACIFIC SDN BHD c/o PACIFIC SHIP MANAGERS SDN BHD,	:	
UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	X	-

PLEASE TAKE NOTICE that Plaintiff, RED SEA PACIFIC SDN BHD c/o
PACIFIC SHIP MANAGERS SDN BHD, (hereinafter "Red Sea" or "Plaintiff"), through
its attorneys Lennon, Murphy & Lennon, LLC upon the annexed Affidavit of Coleen A.
McEvoy dated March 13, 2008, the exhibits annexed thereto, the accompanying
Memorandum of Law, and the pleadings and proceedings previously had herein, will
move this Court, before the Honorable Barbara S. Jones, United States District Court
Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl
Street, Courtroom \_\_\_\_\_, New York, New York, on \_\_\_\_\_\_\_\_, 2008, at a time to be
established by the Court for an Order (1) directing that partial default judgment be
entered against the Defendants, TONGLI SHIPPING CO. LTD. and TONGLI LIMITED,
(2) confirming the underlying arbitration award as a Judgment of this Court; and (3)
granting Plaintiff's request for attorneys' fees and costs, together with such other, further
and different relief as the Court may deem just and proper.

Dated: Southport, CT

March 13, 2008

The Plaintiff, RED SEA PACIFIC SDN BHD c/o PACIFIC SHIP MANAGERS SDN BHD

By:

Coleen A. McEvoy (CM 3379)

Patrick F. Lennon (PL 2162)

LENNON, MURPHY & LÉNNON LLC

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## **AFFIRMATION OF SERVICE**

I hereby certify that on March 13, 2008, a copy of the foregoing will be filed electronically. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by express courier to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system.

Service of the foregoing is being made on Defendants via express courier

Coleen A. McEvoy